

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Civil No.  
Honorable

Two Hundred Seventy-Nine  
Thousand Three Hundred  
Fifty-Four Dollars (\$279,354.00)  
in U.S. Currency;

Defendant *in Rem*,

\_\_\_\_\_ /

**COMPLAINT FOR FORFEITURE**

Plaintiff, the United States of America, by and through Dawn N. Ison, United States Attorney for the Eastern District of Michigan, and Catherine Morris, Assistant United States Attorney, states the following in support of this Complaint for Forfeiture:

**JURISDICTION AND VENUE**

1. This is an *in rem* civil forfeiture action pursuant to 18 U.S.C. § 983(a)(3)(A) and 21 U.S.C. § 881 resulting from violations of 21 U.S.C. § 841.

2. This Court has original jurisdiction over this proceeding pursuant to 28 U.S.C. § 1345 as this action is being commenced by the United States of America as Plaintiff.

3. This Court has jurisdiction over this forfeiture action, pursuant to 28 U.S.C. § 1355(b)(1)(A), as the acts giving rise to the forfeiture occurred in the Eastern District of Michigan.

4. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b)(2) as a substantial part of the events or omissions giving rise to the Government's claims occurred in the Eastern District of Michigan.

5. Venue is also proper before this Court pursuant to 28 U.S.C. § 1395(a), (b) as the Defendant *in rem* was found and seized in the Eastern District of Michigan.

**DEFENDANT *IN REM***

6. The Defendant *in rem* is identified as:

- Two Hundred Seventy-Nine Thousand Three Hundred Fifty-Four Dollars (\$279,354.00) in U.S. Currency (referred to as "Defendant Currency").

### **STATUTORY BASIS FOR FORFEITURE**

7. 21 U.S.C. § 881 governs the civil forfeiture of property which constitutes or is derived from the proceeds of controlled substance crimes, or which is used to facilitate such crimes:

The following shall be subject to forfeiture to the United States and no property right shall exist in them....[a]ll moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.

21 U.S.C. § 881(a)(6).

### **FACTUAL BASIS FOR CIVIL FORFEITURE**

8. The currency is forfeitable to the United States of America as property which was furnished, or was intended to be furnished, in exchange for a controlled substance; as proceeds traceable to such an exchange; and/or as monies which were used or were intended to be used to facilitate a controlled substance violation under Title 21 of the United States Code.

9. The facts supporting forfeiture include, but are not limited to, the following:

- By August 2021, agents of the United States Drug Enforcement Administration had developed information and evidence regarding drug trafficking activities occurring at a residence in Redford, Michigan. On August 18, 2021, DEA agents executed a State of Michigan search warrant at the residential house at XX396 Virgil, Redford, Michigan (the “Virgil Address”).

- At approximately 7:00 a.m., law enforcement arrived at the Virgil Address. Once inside of the home, officers secured a male resident as he exited a bedroom.

- During the search of the home and vehicle associated with the Virgil Address, DEA agents located numerous items, including cellphones, a firearm and ammunition, and the Defendant Currency.

- The door leading to the upstairs master bedroom was padlocked. Inside the master bedroom, agents found:

- Currency located near the headboard of the bed, later counted and determined to be \$132,445.00 in U.S.

Currency.

- Currency located in the closet, later counted and determined to be \$146,909.00 in U.S. Currency.
- Agents seized the Defendant Currency found during the search as proceeds of, or property used or involved in drug trafficking in violation of Title 21 of the United States Code.

### **CLAIM**

10. Plaintiff hereby repeats and re-alleges each and every allegation set forth in paragraphs 1 through 9 above, including the subparagraphs thereunder.

11. The Defendant Currency is forfeitable to the United States of America pursuant to 18 U.S.C. § 983(a)(3)(A) and 21 U.S.C. § 881, resulting from violations of 21 U.S.C. § 841.

### **RELIEF**

Plaintiff, United States of America, respectfully requests that a warrant for arrest of the Defendant *in rem* be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the

Defendant *in rem* condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

Dawn N. Ison  
United States Attorney

s/Catherine Morris  
Catherine Morris  
Assistant United States Attorney  
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(P 84371)

Dated: March 30, 2022

**VERIFICATION**

I, Brent Halbert, am a Special Agent with the Drug Enforcement Administration. I have read the foregoing Complaint for Forfeiture and declare under penalty of perjury that the facts contained therein are true to the best of my knowledge and belief, based upon knowledge possessed by me and/or on information received from other law enforcement agents and/or officers.

A handwritten signature in dark ink, appearing to read "Brent Halbert", is positioned above a horizontal line.

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Special Agent Brent Halbert  
Drug Enforcement Administration

Dated: March 29, 2022